

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN</b>	:	
	:	
<b>and</b>	:	
	:	
<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**[PROPOSED] ORDER**

Upon consideration of Defendant Rafiekian's Motion to Compel, the memorandum in support thereof, any opposition thereto, any reply in further support thereof, and the entire record herein, for good cause shown, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2019 hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that the government shall produce to defendants all portions of all written records containing discoverable statements made by Michael T. Flynn during encounters with any agent, employee, representative, or elected official of any branch of the United States government.

**SO ORDERED.**

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The Honorable Anthony J. Trenga  
United States District Judge